Valdez, Heather

From: Valdez, Heather
Sent: Tuesday, July 28, 2015 3:23 PM
To: 'Nussbaum, Rich'
Cc: Wong, Herman; Hedgpeth, Zach; Palumbo, Janice; 'David A. Weeks'
Subject: RE: reply - Looking for assistance learning about air monitoring in the corrective action setting and the FMC site in Pocatello, ID.

Categories: FOIA

Thanks for the tip Rich! I was actually formerly the waste combustion CAA expert in R10, and helped with the haz waste combustor rule. So I am familiar with incinerator risk assessments. That is a good idea. While you are right the pollutants, emission rates, and variability of generation would be different for a combustion source, it might give me some idea of the typical risk assessment assumptions under RCRA that were made for air modeling that might have been done.

Have a great evening.

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From: Nussbaum, Rich [mailto:rich.nussbaum@dnr.mo.gov]
Sent: Tuesday, July 28, 2015 3:13 PM
To: Valdez, Heather
Subject: RE: Looking for assistance learning about air monitoring in the corrective action setting and the FMC site in Pocatello, ID.

Hi Heather:

I apologize for not immediately recalling the response I apparently provided to Linda in response to her inquiry below. Beyond that though, I can think of one "semi-analogous" situation that might be useful to you. That is the RCRA combustion facility risk-assessments performed under EPA's combustion strategy in the permitting of hazardous waste combustors. While this effort was focused on permitting, it could have application to corrective action as well. Those combustion risk assessments were/are handled under the umbrella of RCRA (or the state's equivalent to RCRA) and were aimed at modeling potential fence line exposures and depositional outfall from emission point sources (stacks) related to hazardous waste combustion activities. There would typically be stack gas and combustion performance tests associated with these modeling efforts and application of those result to air modeling. Granted, the source(s) of air emissions in these cases would be more of a "pinpoint" when compared with emissions from a landfill or surface impoundment but perhaps there is enough flexibility in the air model used in that endeavor that could be applied to

other situations such as yours. Below are a couple of links that might be useful as you research options. You might also want to "google" EPA combustion strategy as there's all kinds of information out there on the topic.

http://www.epa.gov/region6/6pd/rcra_c/pd-o/comb_risk.htm

http://www.epa.gov/scram001/dispersion_prefrec.htm

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From: Valdez, Heather [mailto:Valdez.Heather@epa.gov]
Sent: Tuesday, July 28, 2015 4:35 PM
To: Bailey, Marcia; ed.jones@ecy.wa.gov; Grandinetti, Cami; Bartus, Dave; Craig, Harry; Bray, Dave; Hanley, Tim; Gullett, Brian; Hedgpeth, Zach; Hall, Chris; Wong, Herman; Palumbo, Janice; Hastings, Janis; McArthur, Lisa; Hedeen, Roberta; Castrilli, Laura; Blankenship, Melissa; Knittel, Janette; Boyd, Andrew; Weigel, Greg; Williams, Jonathan; Meyer, Linda; Lynch, Kira; Nussbaum, Rich; Gaines, Jeff; Sharma, Sushmita; David A. Weeks
Subject: Looking for assistance learning about air monitoring in the corrective action setting and the FMC site in Pocatello, ID.

Hi, I am the newest member of the R10 RCRA Corrective Actions and Permits Team and I have been assigned a complex site that I am getting up to speed on. The company is FMC, in Pocatello, ID, it is part of the Eastern Michaud Flats CERCLA Site. At the FMC site, phosphine gas is being generated in caped ponds from waste left in place.

I may have got your name from others on my team who thought you might have some experience that would be helpful for me. Or, I could have found your name in a past document or email. I am eager to learn about corrective actions and would love to take advantage of any expertise you have to help me as I go forward. I was previously in the air program for over a decade.

If you have ever worked on the FMC site, or know someone you think would be good for me to talk to and can pass that name along, I would love to chat and hear your background and thoughts about the site. Let me know if I can try and find some time in the next few months to come by, or give you a call, for us to chat.

I also have a specific topic that I am currently trying to gather as much info as I can on. So please reply with any info or tips and pass this along to others too. I am looking for any past examples you can think of (other than FMC) where health based air monitoring or air modeling to estimate fence-line impacts was done at a corrective action or a superfund site. If there was a landfill or a surface impoundment on the site that would be of greater interest to me, but I am looking for other examples too if there are not landfill or a surface impoundment examples. I want to learn more about how air has typically been regulated in the corrective action setting (where requirements were not

driven by Clean Air Act regulations, but rather through RCRA or CRECLA authorities to protect from the potential impacts of hazardous waste).

Jeff Gaines, Hi, if my name is not already on the list for the RCRA Permit Writers' Conference Call, can you add me to that? That is, if you are still involved with leading those calls, or, please let me know who I should ask. You may recall that Linda Meyer, the staff who managed this project before me, raised this as a topic for discussion in Dec. 2014. I have copied the message below that Linda had sent to you, which was replied to by Rich Nussbaum from MO. The FMC RCRA project was transferred to me a few months ago. I was hired on to the RCRA team from the air program when Linda accepted a new position in CERCLA. I would like to raise this as a topic again for discussion on the call. Would that be possible?

> **From:** Meyer, Linda
> **Sent:** Wednesday, December 03, 2014 8:11 PM
> **To:** Gaines, Jeff
> **Cc:** Bartus, Dave; Blankenship, Melissa; Brown, Christy; Castrilli, Laura; Hastings, Janis; Hedeen, Roberta; Palumbo, Janice
> **Subject:** RE: RCRA Permit Writers' and Subpart X Conference Calls --- requests for topics
>
> Jeff – I have a couple of topics regarding RCRA regulating gas from a surface impoundment with waste left in place at time of closure. The original closure plan/post closure plan identified contingency gas extraction but was not real detailed regarding triggers, how the remedy would be implemented, etc. (the unit was not expected to generate gas). Much of our policy on managing gas from landfills concludes this is something the air program regulates. Does anyone have an example of imposing gas/air emission controls for closured units through post closure? Or examples of using a different program for the controls? (Air or RCRA). Related to this, in establishing acceptable controls what has been used, assuming that the capped area will always be controlled by the facility – should I assume a future receptor at the fence of the facility to assess appropriate air concentrations? At the perimeter of the unit? How about eco receptors?
> This might be too long of topic for the call but maybe we can collect names of folks with experience/opinions with time to discuss as a sub-call. I thought maybe a topic on your share point site if states have access? Thanks.
> **Linda Meyer** | RCRA Project Manager

Thanks for any help you can share!!

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